

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

BRITTANY S. WILLIAMSON

PLAINTIFF

VERSUS

CAUSE NO. 3:20-CV-291-NBB-RP

**FRIENDSHIP PHARMACY, LLC
and KEN NOWLIN**

DEFENDANT

JURY TRIAL DEMANDED

COMPLAINT

This is an action to recover actual and punitive damages for discrimination based upon sex by Friendship Pharmacy, and malicious interference with employment by Ken Nowlin. The following facts support this action:

1.

Plaintiff BRITTANY WILLIAMSON is an adult resident citizen of 143 Private Road 3049, Oxford, Mississippi 38655.

2.

Defendant FRIENDSHIP PHARMACY, LLC is a Mississippi limited liability company. Defendant may be served with process upon its registered agent, Keith C. Kantack, 359 North Broadway Street, Tupelo, Mississippi 38804.

Defendant KEN NOWLIN, upon information and belief, is an adult resident citizen of Pontotoc County, Mississippi. Defendant may be served with process at 5532 Highway 15, Suite 1, Ecu, Mississippi 38841.

3.

This Court has federal question jurisdiction under 28 U.S.C. § 1331, and civil rights jurisdiction under 28 U.S.C. § 1343, for a cause of action arising under Title VII of the Civil Rights Act of 1964. This Court has supplemental jurisdiction over Plaintiff's state law claim.

4.

Plaintiff is a female with a Doctor of Pharmacy (PharmD) degree.

5.

Plaintiff worked for eight (8) months at Friendship Pharmacy. There were no complaints about Plaintiff's work. Plaintiff increased the prescriptions, and her overall performance was excellent.

6.

Defendant Nowlin has three (3) Friendship Clinics and one Friendship Pharmacy.¹ Charlene Black, the office manager, supervises all three (3) clinics and the pharmacy. These facilities employ more than fifteen (15) employees. For Title VII purposes, the facilities are an "integrated enterprise."

7.

On or about April 27, 2020, Richard Doucette, an employee of Affordable Benefits, informed Plaintiff that she was terminated. Doucette informed Plaintiff that there was nothing wrong with her performance, and that the pharmacy manager, Millie Dyson, and the office manager, Charlene Black, opposed her firing.

¹ Defendant Nowlin also owns Affordable Benefits, Friendship Travel Center, and Friendship Fitness, which may be part of the other facilities "integrated enterprise."

8.

Plaintiff was immediately replaced by a male, Keith Guntharp. Mr. Guntharp only has a bachelor's degree. Further, upon information and belief, Mr. Guntharp had issues with a previous employer. There was no legitimate reason for firing Plaintiff and replacing her with Guntharp, other than her gender.

9.

Further, Defendant Nowlin treated Plaintiff in a disparaging fashion because she is a female. Defendant Nowlin appeared to not know Plaintiff's name, and made frequent comments about her appearance.

10.

Defendant Friendship Pharmacy, LLC is liable to Plaintiff for gender discrimination. Defendant Nowlin is liable to Plaintiff for tortious interference with employment.

11.

Plaintiff has suffered lost income and mental anxiety and stress as a result of Defendants' actions.

12.

Because the actions of Defendants were outrageous, Plaintiff requests punitive damages.

13.

Plaintiff has filed an EEOC charge, attached hereto as Exhibit "A," and received a right-to-sue letter, attached hereto as Exhibit "B."

REQUEST FOR RELIEF

Plaintiff requests actual and punitive damages, in an amount to be determined by a jury, reinstatement, and reasonable attorneys' fees, costs, and expenses.

RESPECTFULLY SUBMITTED, this the 5th day of November, 2020.

BRITTANY WILLIAMSON, Plaintiff

By: /s/ Jim Waide
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ATTORNEYS FOR PLAINTIFF

STATE OF MISSISSIPPI

COUNTY OF LEE

PERSONALLY came and appeared before me, the undersigned authority in and for the aforesaid jurisdiction, the within named **BRITTANY S. WILLIAMSON**, who, after being first duly sworn, states under oath that the facts contained in the above and foregoing **COMPLAINT** are true and correct as stated therein.

Brittany S. Williamson
BRITTANY S. WILLIAMSON

GIVEN under my hand and official seal of office on this the 3rd day of November, 2020.

(SEAL)



Haley C. Fuller
NOTARY PUBLIC

My Commission Expires: July 15, 2022